Garden State Energy Path

PJM Pre-Qualification Package

Application for Designated Entity Status

June 28, 2024

Garden State Energy Path, LLC submits this pre-qualification application pursuant to Schedule 6, section 1.5.8(a) of the Amended and Restated Operating Agreement of PJM Interconnection, L.L.C. Garden State Energy Path, LLC is a joint venture between Con Edison Transmission, Inc. ("CET) and NGV US Transmission, Inc. ("NGV"). [1] This application uses qualifications, experiences, and capabilities from CET and NGV, and their affiliates.

[redacted]

[redacted]

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1. Name and address of the entity, including a point of contact

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2. Technical and engineering qualifications of the entity or its affiliate, partner or parent company;

Garden State Energy Path, LLC (entity)
The Garden State Energy Path, LLC ("GSEP") entity is a joint venture between Con Edison Transmission, Inc. ("CET") and NGV US Transmission, Inc. ("NGV") ("the JV Companies"). The JV Companies are leaders in the energy industry, particularly in the Northeast, with extensive experience at both the entity and affiliate level in developing, constructing, owning, maintaining, and operating underground, high-voltage electric transmission facilities in densely populated areas.

The JV Companies have a longstanding history of collaborating and partnering together to develop transmission solutions. Notable is their involvement in New York Transco LLC ("NY Transco"), a partnership of the four New York State investor-owned utilities, two of which are the JV Companies. The mission of NY Transco is to plan, develop, and own new high-voltage electric transmission projects in New York that will reduce power flow congestion, facilitate the growth of renewable generation sources, and provide continued grid reliability. As the two largest investors of NY Transco, CET and NGV work together during both development and construction phases of projects to safely deliver solutions that provide benefit to customers and achieve operational excellence.

Further qualifications of the Parent Companies are described in detail below.

Con Edison Transmission, Inc. (parent)
CET, a subsidiary of Consolidated Edison, Inc. ("CEI"), was formed in 2016 and is a leading transmission development company and owner of electric and gas transmission assets. Its mission is to deliver transmission solutions that enable the transition to a clean energy future. CET's electric transmission solutions deliver cost-effective and reliable clean energy to demand centers, which are expandable to meet future growth. CET's electric portfolio includes NY Transco and numerous ongoing development projects in New Jersey, New York, the Mid-Atlantic, New England, and offshore.

In New Jersey, CET participated in the state's first State Agreement Approach ("SAA") solicitation in 2021, proposing Clean Link New Jersey. This project included an underground power corridor design and offered interconnections to the Larrabee, Smithburg, and Deans substations. The project also included designs for an independently owned offshore mesh network. The power corridor design proposed by CET allowed for multiple high-voltage direct current ("HVDC") export cables to utilize the same strategic right-of-way ("ROW") and landfall location to deliver offshore wind ("OSW") generation to the PJM grid, while both maximizing capacity transfer and minimizing disruption to the shore communities hosting the infrastructure. In New York, CET has participated in all aspects of OSW transmission. CET has been active in New England for several years developing transmission solutions to connect renewable energy sources to the existing grid.

[redacted]

CET's gas portfolio includes a minority investment in Mountain Valley Pipeline ("MVP") and a majority share of Honeoye Storage Corporation ("HSC"), which is indirectly wholly owned by CEI.

CET has been able to utilize the skills and experience of its staff gained, in part, from prior experience at Consolidated Edison Company of New York, Inc. ("CECONY") and Orange and Rockland Utilities, Inc. ("O&R"). In addition, resources of its affiliated companies are available, as appropriate, to facilitate project development. Together, CEI has over 200 years of experience developing, constructing, maintaining, and operating electric and gas facilities.

CET has been a PJM Pre-Qualified Designated Entity since 2021.

CEI and other Con Edison affiliates
CET is a subsidiary of Consolidated Edison, Inc. ("CEI"), a Fortune 500 company and one of the nation's largest investor-owned energy-delivery companies, with approximately $15 billion in revenue and $66 billion in assets. Its leadership and commitment to reliability has been demonstrated and recognized in the energy industry for over 200 years, and the Con Edison companies (including CET, Con Edison Company of New York, Inc. (CECONY), and Orange and Rockland Utilities, Inc.) deliver electric, gas, and/or steam power to over 9 million people in the New York and New Jersey region. Orange and Rockland Utilities' subsidiary Rockland Electric Company serves customers in New Jersey, while Orange and Rockland Utilities and CECONY serves customers in New York. In addition, Con Edison has a historic reputation for reliably operating one of the most complex and reliable underground energy systems in the world, and has been recognized for exceptional system reliability, winning PA Consulting's Reliability One award each year for more than a decade[2]. Con Edison's facilities include both underground and overhead assets including over 128,000 miles of electric and gas transmission and distribution. infrastructure, over 60 substations, and steam infrastructure.

NGV US Transmission, Inc. (parent)
NGV is the competitive division of National Grid plc, one of the largest investor-owned energy transition companies in the world. NGV is shareholder-funded and operates outside of National Grid's core, regulated businesses. It develops, finances, operates, and invests in projects, technologies, and partnerships to accelerate the development of our clean energy future. Its diverse portfolio includes subsea HVDC electricity interconnectors in the United Kingdom, competitive transmission, large-scale renewable generation, battery storage, hydrogen blending,

[2] Con Edison Wins 2023 ReliabilityOne Awards for Outstanding Electric Service | Con Edison

liquefied natural gas storage and regasification, and conventional generation. NGV US Transmission, Inc. formed in 2002 originally as GridAmerica Holdings, is the legal entity utilized for transmission projects in the US.

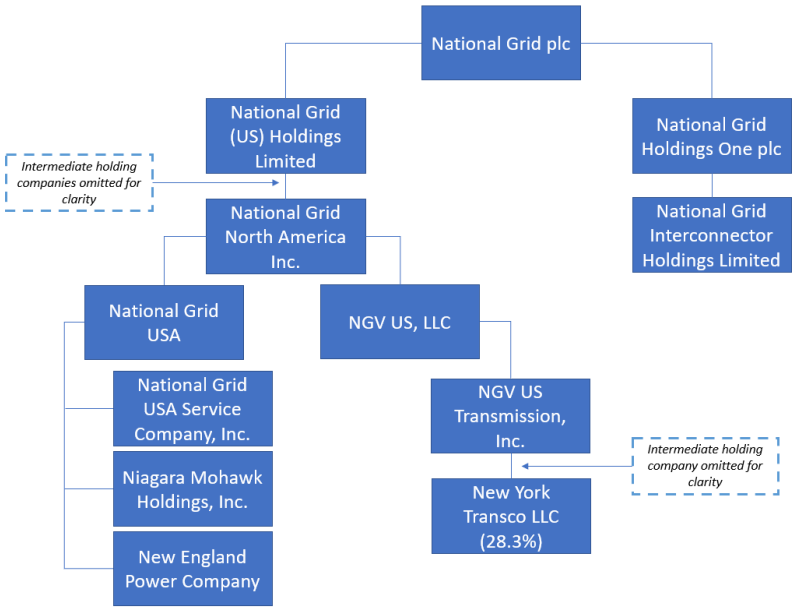
NGV's engineering teams have experience gained over decades of projects as utility engineers and consulting engineers. We have capabilities in system planning, substation engineering, and construction. Our staff has also acted as lead Engineer for overhead and underground transmission projects in New York and Massachusetts. The Development Team is experienced in environmental, permitting, real estate (ROW), along with general project management and delivery. Throughout all phases of project development and delivery, our team places the highest priority on early and often engagement with all stakeholders to ensure that considerations are taken to integrate input and manage schedules for on-time and on-budget delivery.

NGV US Transmission was previously a Pre-Qualified Designated Entity in PJM under GridAmerica Holdings and currently has an application under review at PJM to qualify for the designation again.

National Grid plc and other National Grid affiliates
NGV's Parent Company, National Grid plc, is also the Parent Company of entities engaged in the transmission and distribution of electricity and gas in Great Britain and northeastern US. *See* Figure 1 below for an organizational chart showing National Grid Plc's corporate structure. The Company is a public limited company, limited by shares. The Company is incorporated and domiciled in England. Under the holding company structure, NGV US Transmission and its transmission and distribution affiliates receive legal, administrative, accounting, engineering, procurement, inventory management, project management, construction and operational support services from National Grid USA Service Company, Inc. (the "Service Company"), a centralized service company under FERC regulation, which is also a wholly-owned subsidiary of National Grid Plc. NGV US Transmission and the Service Company are both subsidiaries of and receive financial support from National Grid North America ("NGNA"). National Grid Plc and its direct and indirect subsidiaries, including NGV US Transmission, are sometimes hereinafter referred to, collectively, as "National Grid."

As permitted by NERC registration requirements, National Grid's NERC registrations have been consolidated by functions common among National Grid USA's various operating subsidiaries. National Grid USA is registered on behalf of its subsidiary operating utilities including any NERC and NPCC functional obligations. NGV US Transmission would become registered and comply with NERC reliability standards.

Figure 1: National Grid Group Structure



National Grid USA ("NGUSA"), another affiliate of NGV, through its subsidiaries, engineers, designs, permits, constructs, owns and operates transmission facilities across upstate New York, Massachusetts, New Hampshire, Rhode Island, and Vermont and owns and operates electricity distribution networks in upstate New York and Massachusetts. Its network includes more than 8,000 miles of transmission lines. NGUSA's Service Company employs uniquely qualified technical and engineering personnel who provide extensive background, experience and expertise in the planning, engineering, procurement, construction, operation and maintenance of transmission lines and substation facilities. National Grid USA's subsidiaries have established well-qualified teams focused on transmission line engineering, substation engineering and design, transmission planning and asset management, transmission line construction, substation construction, substation operations and maintenance, underground line operations, overhead line operations, control center operations, protection and control, standards engineering, risk and special projects, project controls and estimating, and investment planning and portfolio oversight. The ability to do work including preliminary and detailed engineering, design and surveying of facilities, is evidenced in the list of projects in the following section of this application. National Grid USA uses both internal and contract resources to perform routing and siting studies and public outreach. National Grid USA uses a competitive procurement process for contractors, material, tools, vehicles and equipment and has a network of line engineering and design firms, construction contractors, vegetation management contractors, material suppliers and other external specialists with national reputations to assist it. NGV follows a similar procurement process and as an affiliate, employs, seconds, or obtains consulting services from the Service Company employees.

National Grid USA and its subsidiaries have thirteen pending potential non-compliances with Northeast Power Coordinating Council ("NPCC"). National Grid has a strong culture of compliance and a well-established control framework in place to meet NPCC and NERC compliance standards that includes a process to review events, correct issues and self-report.

3. **Demonstrated experience of the entity or its affiliate, partner or parent company to develop, construct, maintain and operate transmission facilities, including a list or other evidence of transmission facilities previously developed regarding construction, maintenance or operation of transmission facilities both inside and outside the PJM region;**

GSEP and the JV Companies' joint experience
The JV Companies and their affiliates have a longstanding history of partnering together and working independently to develop, construct, own, operate, and maintain transmission facilities in the Northeast region, including PJM. As stated in Section 2, CET and NGV have joint experience as owners of the NY Transco. NY Transco has over 115 miles of transmission in-service. Such assets include three projects in-service since June 2016, two projects in-service since 2023, one project under construction, and one project in-development.

In June 2016, New York Transco energized three new projects: Ramapo to Rock Tavern 345 kV Line, Frasers-Coopers Corner 345 kV Line, and Staten Island Unbottling. These transmission upgrades contribute to reliability and reduce upstate to downstate transmission congestion, which saves money for electricity consumers.

In 2023, NY Transco completed construction of the New York Energy Solution and its related project, Rock Tavern to Sugarloaf, and is continuing to develop and construct Dover Station. Through these projects, the New York Energy Solution design relieves grid congestion and brings more renewable energy from upstate to downstate New York, while maximizing use of existing ROWs, and reducing the number of transmission towers by replacing them with a new tower design that stakeholders agree is a visual improvement. New York Energy Solution upgraded approximately 55 miles of existing utility infrastructure, permanently eliminating approximately 230 existing transmission structures, and replacing other towers with new monopole structures, while Rock Tavern to Sugarloaf replaced aging infrastructure with modern structures along a 12-mile ROW, relieving grid congestion. These two projects were completed six months ahead of schedule and went into service mid-2023.

Further, in 2023, NY Transco, in partnership with NY Power Authority, was awarded the Propel NY Energy project. This project was selected as the winner of an New York Independent System Operator competitive solicitation to improve the transmission grid on Long Island to support OSW injection in New York. It will result in approximately 90 miles of new underground and subsea 115 kV and 345 kV transmission lines within the New York metro area, five new 345 kV substations, and three upgraded 345kV substations. The project is expected to be in-service in 2030.

CET and its affiliates individual experience
In addition to CET's part ownership of NY Transco, CET's gas portfolio includes two investments, HSC and MVP. MVP is a 303-mile pipeline which was placed in-service in June 2024. CET is also a majority owner of HSC, a 6.7 billion cubic foot natural gas storage field located in Ontario County, New York that provides contracted storage services to major northeast utilities.

In addition to CET's electric and gas portfolio, its sister companies, CECONY and O&R, have extensive experience developing, constructing, maintaining, and operating transmission facilities. The following is a list of recent projects in development and completed by CECONY and O&R:

[redacted]

- Reliable Clean Cities Project – Staten Island feeder replacements (in-service 2024)
- Reliable Clean Cities Project - Rainey and Corona Substation upgrades and two new 138 kV feeders (in-service 2019 and 2023)
- Ramapo bank 1300 replacement – 525 MVA transformer (in-service 2020)
- Installation of UG Cable 69 kV Line 47 (in-service 2020)
- Rainey to Corona 1 (36187) PAR controlled 138kV feeder (in-service 2019)
- Ramapo bank 2300 replacement - 525 MVA transformer (in-service 2019)

NGV and its affiliates individual experience
In addition to NGV's part ownership of NY Transco in New York, in the UK, NGV's affiliate is the leading developer and operator of interconnectors, with a portfolio of six interconnectors that have a total combined capacity of 9.4 GW and includes the longest land and subsea interconnector in the world, Viking Link, which stretches 475 miles, connecting the grids in the UK and Denmark. National Grid's interconnectors are HVDC subsea cables with related converter stations that enable the UK to share excess power with neighboring markets and vice versa. All interconnectors are developed, constructed, and operated by National Grid Ventures. The first interconnector developed by National Grid, IFA, reached commercial operation date in 1986 and National Grid recently announced the development of LionLink, a first-of-its-kind multi-purpose interconnector project designed to allow multiple wind farms to connect to shore via a single offshore connection point.

As an affiliate of National Grid USA, NGV has access to the same resources as National Grid USA's subsidiaries, New England Power Company ("NEP") and Niagara Mohawk Holdings, Inc. The following projects have been developed with such resources in the past years, demonstrating National Grid's experience with developing, constructing, maintaining, and operating transmission facilities. Some of those projects include:

- New England Power Company (NEP) (Affiliate)
  - Woburn-Wakefield 345kV Cable Project (in-service January 2024)
  - 532N/533N Cable Replacement Project (in-service May 2024)
  - Ready Path Solution (in-service June 2023)
- Niagara Mohawk Holdings, Inc. (NIMO) (Affiliate)
  - Smart Path Connect 345kV (In-service Q4 2025)
  - CLCPA Phase I and II (in-service by 2030)
  - Mohican-Battenkill #15 Rebuild/Reconductor (in-service 2017)

4. Previous record of the entity or its affiliate, partner or parent company to adhere to construction, maintenance and operating standards;

The JV Companies and their affiliates have a proven track record of delivering large, complex transmission projects on schedule and reliably maintaining and operating those facilities in accordance with best industry practice. The JV Companies work closely with experienced in-house and third-party consultants: engineers, regulators, procurement, and construction firms ("EPCs") to provide services such as project management, project controls, engineering, construction management, procurement, permitting, and stakeholder relations. These subject matter experts are experienced firms with proven track records and experience working on large projects in the Northeast and throughout the country. All projects are designed in accordance with all applicable industry standards and in conformance with utility design practices and applicable law. The JV Companies' staff has significant experience managing projects that

employ multiple vendors, contractors, and consultants. GSEP together with PJM, will be responsible for meeting North American Electric Reliability Corporation ("NERC") requirements.

The affiliates of the JV Companies also have a long history of successfully executing large-scale, complex, and innovative transmission projects, throughout New York and New England over the last several decades. As noted in Section 1, Con Edison has a historic reputation for operating one of the most complex and reliable underground energy systems in the world. Con Edison's facilities include both underground and overhead assets including over 128,000 miles of electric and gas transmission and distribution. infrastructure, over 60 substations, and steam infrastructure. In addition, National Grid has a similar track record of success, with its innovative multi-value projects to improve deliverability of clean energy while strengthening the reliability and the resiliency of the grid. With 9,000 miles of electric transmission lines and 70,000 miles of electric distribution lines, as well as 37,000 miles of gas pipelines in the US, National Grid helps heat and power homes and businesses and connect communities to the energy they need. National Grid has had 15 successful transmission project CECPN (Certificate of Environmental Compatibility and Public Need) and EM&CP (Environmental Management and Construction Plan) approvals since 2000. Further, National Grid also has over 30 years of experience operating one of the only HVDC converter stations in the Northeastern United States, Sandy Pond, which was the world's first only multi-terminal bipole HVDC system. National Grid's experience with HVDC and HVAC equipment informs NGV US Transmission's engineering and procurement processes.

5. **Capability of the entity or its affiliate, partner or parent company to adhere to standardized construction, maintenance and operating practices;**

The JV Companies and affiliates have a longstanding history of adhering to standardized construction, maintenance, and operating practices. GSEP combines expertise and best practices from both organizations.

CET and its affiliates, as described in Section 4.0, staff and hired consultants are well versed with standardized practices and incorporate these into development, design construction, maintenance, and operations activities. In addition to complying to industry standards, CET and its affiliates comply with ISO/RTO, NERC, FERC and NYPSC affiliate requirements and will continue to in the future for all development projects.

NGV and its affiliates are also committed to Safety, Engineering and Asset Management excellence through adherence to a multitude of complementary methods and controls, using both internal disciplines and external compliance requirements. National Grid uses a framework that describes the factors that must be considered and complied with as part of the overall

engineering management system when we design, develop, test, commission, operate, maintain and, ultimately, decommission our assets. This applies to all of our businesses, current and future assets and infrastructure used in the transportation and storage of energy, including measurement, control, process and communication systems that we use to monitor and operate our networks and assets.

National Grid adheres and strives to address all Environmental and OSHA requirements at all times. National Grid, a member of the NPCC, is registered at NERC for compliance with all applicable mandatory standards and requirements for the following functions: TO, TOP, TP, GO, GOP, TSP, LSE and PSE, across New England and New York. National Grid also complies with all more stringent regional standards, the ISO-NE and NYISO standards, procedures and operating requirements and the NYSRC standards and will comply with any similar standards, procedures, and operating requirements specific to PJM or its states.

6. **Financial statements of the entity or its affiliate, partner or parent company for the most recent fiscal quarter, as well as the most recent three fiscal years, or the period of the entity's existence, if shorter, or such other evidence demonstrating an entity's or its affiliates, partner's or parent company's current and expected financial capability acceptable to PJM;**

CET's financial information is represented in its parent company's, CEI, annual reports.

- 2024: 10-Q Report, for the Quarterly period ended March 31, 2024
- 2023 Annual Report
- 2022 Annual Report
- 2021 Annual Report

CET has no history of bankruptcy or dissolution in the last five years. The credit rating of CEI is Baa1 / P-2 (Moody's), A- (S&P), and BBB+ (Fitch).

NGV US Transmission's financial information is represented in National Grid North America Inc. and Subsidiaries financial statements. National Grid North America Inc. ("NGNA") is a wholly owned subsidiary of National Grid plc, the ultimate parent company of NGV US Transmission, Inc. As such financial statements of NGNA and the annual reports of National Grid plc are both linked below.

National Grid US Reports:

- National Grid North America Inc. and Subsidiaries – 2020-2021
- National Grid North America Inc. and Subsidiaries – 2021-2022
- National Grid North America Inc. and Subsidiaries – 2022-2023

- National Grid USA and Subsidiaries – 2020-2021
- National Grid USA and Subsidiaries – 2021-2022
- National Grid USA and Subsidiaries – 2022-2023

National Grid Plc Annual Reports

- National Grid Plc – 2020-2021
- National Grid Plc – 2021-2022

- National Grid Plc – 2022-2023
- National Grid Plc – 2023-2024 Half Year Results Statement

NGV US Transmission has no history of bankruptcy or dissolution in the last five years. The credit rating of National Grid plc is Baa2 / P2 (Moody's), BBB / A2 (S&P), and BBB (Fitch).

7. Commitment by the entity to execute the Consolidated Transmission Owners Agreement, if the entity becomes a Designated Entity;

Garden State Energy Path, LLC commits to executing, or causing the JV Companies to execute, the Consolidated Transmission Owners Agreement if it becomes a Designated Entity in the PJM Region.

8. Evidence demonstrating the ability of the entity or its affiliate, partner or parent company to address and timely remedy failure of facilities;

The GSEP partnership is capable and prepared to address all future emergencies and failures of facilities. CET, NGV, and their affiliates have a proven track record of reliably operating and maintaining transmission facilities and have demonstrated such ability to timely remedy failures of facilities.

CET believes an appropriate response to failures requires a variety of solutions depending on the circumstances of the situation at hand. CET manages restoration and response at the project level. Some examples of implemented and in-place practices/procedures at CET's investments include, but are not limited to:

- Employees, contractors, and suppliers are responsive on a 24-7/365-day-a-year basis and are ready to address all system emergencies that occur
- On-call personnel procedures
- Emergency Response and Incident Management Plans
- Engagement with government officials
- Tabletop drills
- Training on damage assessment
- Inventory of critical spare equipment
- Engagement with industry associations

Additionally, to proactively protect against failure of facilities, CET's affiliates perform routine inspection and maintenance of facilities on an ongoing basis. System damage can be caused by vehicles, storms, vandalism, or material failure. To increase resiliency of their assets and protect against these damages, CET's affiliates have invested in storm hardening upgrades, 24/7 security and surveillance, and advanced vegetation management programs.

As a long-term transmission owner, CET's affiliates have successfully responded to emergencies on numerous occasions ranging from miscellaneous hardware replacements to full structure replacements to multiple structure replacements. Timely remedy of facility failures is a critical activity, and CET's affiliates address these failures with three guiding principles in mind: safety, operational excellence, and the customer experience.

NGV also views the reliability of the transmission system is paramount to all of National Grid and responds in appropriate timeframes to issues to provide an adequate and acceptable level of reliability for our customers. Over the last three fiscal years, National Grid's New England and New York transmission operating companies maintained above 99.95% network reliability. NGV has similar success limiting downtime of its subsea HVDC interconnectors. Over the last half year Nemo Link operated at 98% availability and BritNed at 95% availability. National Grid's ability to maintain high network reliability is largely due to the experience of its staff and the ability to seamlessly apply best practices and learnings from experience across various markets.

National Grid has dedicated Emergency Planning teams within the New England and New York operating companies. These groups are responsible for planning all employees' emergency assignments, training, emergency tabletop exercise, external coordination and coordination across local, states, regional and national requirements and government agencies. NGV will leverage the knowledge and experience of these Emergency Planning teams to develop and execute its operation and maintenance plans, including timely remedy of failures, and to manage the resource providing O&M services, which may be through direct NGV employees or contracted services, as appropriate.

9. Description of the experience of the entity or its affiliate, partner or parent company in acquiring rights of way; and

The JV Companies and their affiliates have substantial experience acquiring rights of way ("ROW"). GSEP aims to minimize environmental and community impacts as much as practicable and pursues the use of existing ROWs whenever possible. In the engineering and development phase of projects, both CET and NGV work alongside stakeholder engagement teams to analyze project alternatives, route determinations, impacts of environmental and non-environmental permitting on the proposed alternatives, key outreach objectives, constructability, community impacts, and cost impacts for each alternative route in order to determine the optimal project and route. In addition, the GSEP team also actively involves community stakeholders, government agencies and the media as early and proactive outreach is extremely helpful in obtaining valuable feedback for making routing decisions and achieving siting approvals.

CET and NGV use resources from both its affiliates and contracted EPCs' subject matter experts to develop projects. This includes the verification of new or existing ROW, research, negotiations, notifications, and acquisition of ROW.

10. Any other supporting information the PJM requires to determine the entity's prequalification status including but not limited to the execution of a Non-Disclosure Agreement to protect sensitive discussions as may occur between proposing entities and PJM

The JV Companies have nothing to add at this time.